

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA and
STATE OF FLORIDA *ex rel.*
OMNI HEALTHCARE, INC.

Plaintiffs,

v.

STEWARD HEALTH CARE SYSTEM LLC;
STEWARD HEALTH CARE HOLDINGS LLC;
STEWARD HEALTH CARE INVESTORS, LLC;
CERBERUS CAPITAL MANAGEMENT, L.P.;
STEWARD PHYSICIAN CONTRACTING, INC;
STEWARD MELBOURNE HOSPITAL, INC d/b/a
MELBOURNE REGIONAL MEDICAL CENTER;
STEWARD ROCKLEDGE HOSPITAL, INC. d/b/a
ROCKLEDGE REGIONAL MEDICAL CENTER;
RALPH DE LA TORRE; MICHAEL CALLUM;
DANIEL KNELL; JOSH PUTTER; TIM
CROWLEY AND JAMES RENNA,

Defendants.

Case No.: 3-21-cv-0870-S

JOINT PROPOSED BRIEFING SCHEDULE

Relator Omni Healthcare, Inc. and Defendants Steward Health Care System LLC, Steward Health Care Holdings LLC, Steward Healthcare Investors, LLC, Steward Physician Contract, Inc., Steward Melbourne Hospital, Inc. d/b/a Regional Medical Center, Steward Rockledge Hospital, Inc. d/b/a Rockledge Regional Medical Center, Sebastian River Medical Center, Inc. d/b/a Sebastian River Medical Center, Ralph de la Torre, and Michael Callum (“Steward Defendants”) hereby submit this Joint Proposed Briefing Schedule to inform the Court of their agreed-upon briefing schedule for the Steward Defendants’ answers or other responses to the Complaint filed in the above-captioned action. The parties stipulate that the return of the Steward Defendants’ waiver of service forms occurred on September 6, 2023.

The parties agree to the following schedule:

Steward Defendants' Answers or Motions to Dismiss Due	November 6, 2023
Relator's Opposition(s) to Motions to Dismiss Due	December 6, 2023
Steward Defendants' Replies to Opposition(s) to Motions to Dismiss Due	December 20, 2023

Dated: November 2, 2023

Respectfully submitted,

McDermott Will & Emery LLP

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Regional Medical Center; and Sebastian River
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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2023, I electronically filed the foregoing document using the Court's ECF system, which will send notice of the filing to all counsel of record via e-mail.

/s/ Kaylynn Webb

Kaylynn Webb